



*Phone:* (212) 885-5140  
*Fax:* (917) 332-3760  
*Email:* [RMcEvoy@BlankRome.com](mailto:RMcEvoy@BlankRome.com)

March 17, 2015

**BY ECF**

Hon. Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1640  
New York, New York 10007

Re: Varughese v. Mount Sinai Medical Center, et al.  
Docket No.: 12 Civ. 8812 (CM) (JCF)

Dear Judge McMahon:

On behalf of our clients, The Mount Sinai Hospital and the individual defendants (collectively "Defendants"), I write in response to the March 13 Order that the actual audio recordings that correspond to the transcripts submitted by Plaintiff in support of her opposition to Defendants' motion for summary judgment be submitted to the Court by March 17. The transcripts submitted by Plaintiff that purport to reflect conversations she had with various Mount Sinai administrators were recorded surreptitiously by Plaintiff and Defendants are not in possession of these actual recordings. It appears that Plaintiff submitted some form of the recordings to the Court earlier today. The internal hearing referred to in the Order appears to be the medical staff hearing on Plaintiff's appeal from the decision to discharge her from the residency program. A court reporter retained by Mount Sinai was present and a transcript of the hearing was prepared, but Defendants are not in possession of any audio recording of that hearing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rory J. McEvoy".

Rory J. McEvoy

cc: Leena Varughese, M.D. (via ECF and email)  
*Pro se* Plaintiff

The Chrysler Building 405 Lexington Avenue New York, NY 10174-0208  
[www.BlankRome.com](http://www.BlankRome.com)